



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*26 Federal Plaza, 37th Floor
New York, New York 10278*

March 21, 2024

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Daryl Campbell*, 17 Cr. 112 (LGS)

Dear Judge Schofield:

The Government respectfully submits this letter with respect to the defendant's sentencing, currently scheduled for April 8, 2024. For the reasons briefly discussed below, the Court should impose a sentence within the 92 to 115 month range recommended by the United States Sentencing Guidelines ("U.S.S.G" or "Guidelines"). The defendant also requests a sentence within that range. (Dkt. 122 at 13).

The defendant is serving a 35-year state sentence for the same underlying criminal acts at issue here—in substance, shooting multiple people, one fatally, at a crowded Manhattan music venue. (*See* PSR ¶¶ 11-26, 46). The parties agree that his federal and state sentences should be served concurrently, because they arise from the same conduct. (PSR ¶ 5; Dkt. 122 at 13). The defendant has been in federal custody since his arrest in this case on January 17, 2017 (PSR ¶ 7), and has thus served approximately 86 months.

The Government does not agree with many of the assertions in the defendant's submission. For example, that Campbell had a difficult upbringing in no way mitigates his decision to illegally obtain a semiautomatic handgun, then use it to shoot multiple people. That is especially so given that, as Campbell admits, by the time of the shooting he had become a successful entrepreneur, "wholly disconnected from the environment he grew up in." (Dkt. 112 at 12). Nonetheless, the Court need not resolve these disputes given that the parties agree that Campbell should receive a

concurrent sentence of 92 to 115 months' imprisonment—a sentence which he has largely already served—and that further punishment will be determined by his state sentence.

Respectfully submitted,

Damian Williams
United States Attorney

By: _____/s/_____
Hagan Scotten
Assistant U. S. Attorney